

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



May 17, 2013

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a Reception  
Following the Sally Ride National Tribute hosted by Sally Ride Science and  
Exxon on May 20, 2013.

On May 20, 2013, Sally Ride Science, a 501(c)(3) non-profit, and Exxon-Mobil Corporation will host a reception for approximately 200 people on the Kennedy Center Roof Terrace Restaurant from 8:30 to 10 pm. This event will follow the National Tribute to Sally Ride to be held at the Kennedy Center earlier that evening.

Invitees include representatives from various institutes, academic institutions, and other non-profit organizations, the media, NASA's industrial partners, and the executive branch, as well as members of the United States Congress. The approximate average value of the event, which includes all food and refreshments, will be approximately \$37 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs and policies with senior representatives of important national communities. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect an event sponsor, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the value of the event and any gift items accepted for themselves and any accompanying guest.

*Kathleen T. Spear*

*for* Adam F. Greenstone